
UNITED STATES DISTRICT COURT
DISTRICT OF MINNESOTA

Cheryl Sagataw, DeAnthony
Barnes, Roberta Strong, and
Travis Neloms, *on behalf of
themselves and a class of similarly
situated individuals,*

Ct. File No. 24-cv-00001(ECF/TNL)

Plaintiffs,

DECLARATION OF DONNA
PUSUSTA NESTE

v.

Mayor Jacob Frey, *in his individual and
official capacity.*

Defendant.

Your Declarant is Donna Neste, and she submits the following declaration:

1. I own and live in a home that is near the Nenookaasi encampment when it was located at 26th Street and 14th Avenue South.
2. The Nenookaasi encampment existed at this location from approximately January 4, 2024 until it was closed on January 30, 2024. During this time, the encampment had a significant negative impact on me.
3. The encampment typically had many fires burning at any given point. This generated an incredible amount of smoke in the neighborhood.

4. The smoke not only hung over the neighborhood, but it also permeated the nearby houses. Smoke was regularly visible in the air, and the smell of smoke permeated my home. The smoke caused my significant discomfort and made me feel unwell.
5. There are many individuals in the neighborhood that suffer from compromised immune systems, and the smoke caused significant impacts on their health and safety.
6. During the time that the Nenookaasi encampment was located at 26th Street and 14th Avenue South, there was significant criminal activity in the neighborhood, including but not limited to stealing cars, stealing personal property, including propane tanks, human trafficking, and illegal drug sale and use. This caused me concern for my personal safety.
7. During the time that the Nenookaasi encampment was located at 26th Street and 14th Avenue South, I was also aware that there was a virus outbreak at the encampment. This also caused me concern for my personal health and safety.
8. I declare under penalty of perjury that everything I have stated in this declaration is true and correct. Signed in Hennepin County, Minnesota.

Dated: 2/29/24

/s Donna Pususta Neste
Donna Pususta Neste